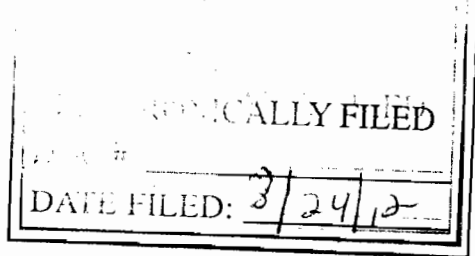


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



DEBORAH D. PETERSON,
Personal Representative of the Estate
Of James C. Knipple (Dec.), et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN; BANK
MARKAZI a/k/a CENTRAL BANK OF
IRAN; BANCA UBAE SpA; CITIBANK,
N.A., and CLEARSTREAM BANKING, S.A.,

Defendants.

Case No.: 10 CIV 4518 (BSJ) (GWG)

**STIPULATION AS TO FILING OF
SUPPLEMENTAL BRIEFS ON
PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT**

It is hereby stipulated by and between Plaintiffs listed on Exhibit A annexed hereto and the Defendants, by their undersigned attorneys, as follows:

Whereas the Plaintiffs moved for partial summary judgment by notice of motion dated April 2, 2012, which motion was submitted for decision to the Court on August 6, 2012; and

Whereas on August 10, 2012, President Obama signed into law the Iran Threat Reduction and Syria Human Rights Act of 2012, Public Law No. 112-158, 126 Stat. 1214 (the "Act"); and

Whereas Section 502 of the Act may affect the Court's decision with respect to the relief sought in the Plaintiffs' motion for partial summary judgment, and the parties desire to file additional briefs that address the effect of the Act on the relief sought by the Plaintiffs in their motion;

Therefore the undersigned parties agree as follows:

1. The judgment creditors may file a supplemental brief and supporting papers addressing the effect of the Act on their motion for partial summary judgment on or before September 14, 2012;
2. The defendants may file an answering brief and supporting papers on or before October 12, 2012; and
3. The judgment creditors may file a reply brief and supporting papers on or before October 26, 2012.

By agreeing on the within briefing schedule, Defendant Banca UBAE S.p.A. does not waive or intend to waive defenses of lack of subject matter jurisdiction and/or lack of personal jurisdiction. In addition, nothing in this Stipulation should be deemed as a jurisdictional waiver because this Court on several occasions, and over UBAE's objections, has held UBAE's jurisdictional motion in abeyance pending the resolution of, inter alia, the Peterson Plaintiffs' motion for partial summary judgment.

Dated: August 20, 2012

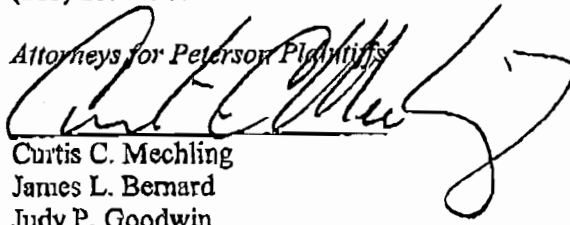


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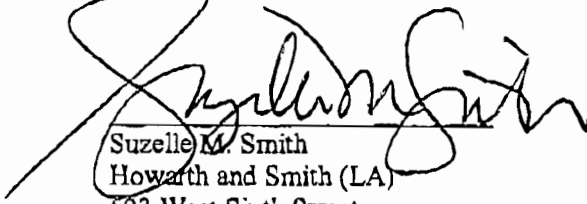
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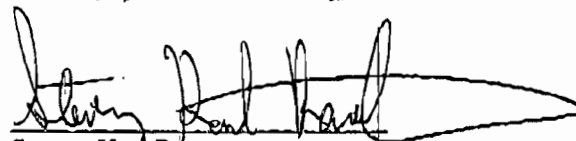
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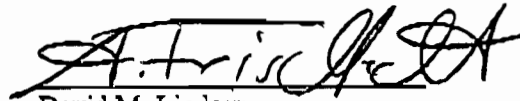
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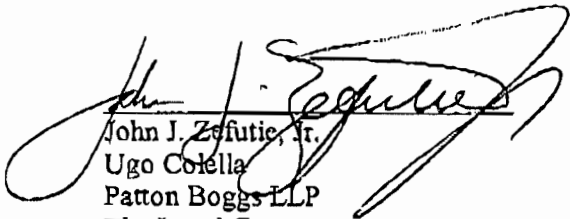
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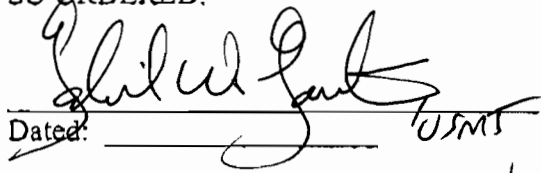
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SO ORDERED:



Dated: _____

8/24/2012

Exhibit A

“**Peterson Plaintiffs**” refer to the plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Deborah D. Peterson, et al. v. Islamic Republic of Iran, et al.*, Civil Action Nos. 01-2094 and 01-2684 (RCL), who seek to enforce their judgment in the amount of \$2,656,944,877.00, arising from the deaths of 241 United States Marines, United States Navy medical personnel and soldiers assigned to the 24th Marine Amphibious Unit that resulted from the October 23, 1983 Iran-sponsored terrorist bombing of the United State Marine Barracks in Beirut, Lebanon.

“**Valore Plaintiffs**” refer to the plaintiffs identified in the complaints filed in the United States District Court for the District of Columbia entitled *Valore, et al. v. Islamic Republic of Iran, et al.*, No. 03-cv-1959 (RCL), *Arnold, et al. v. Islamic Republic of Iran, et al.*, No. 06-cv-516 (RCL), *Spencer, et al. v. Islamic Republic of Iran, et al.*, No. 06-cv-750 (RCL), and *Bonk, et al. v. Islamic Republic of Iran, et al.*, No. 08-cv-1273 (RCL), who seek to enforce their judgment in the amount of \$1,290,291,092.00, arising from the deaths of 241 United States Marines, United States Navy medical personnel and soldiers assigned to the 24th Marine Amphibious Unit that resulted from the October 23, 1983 Iran-sponsored terrorist bombing of the United State Marine Barracks in Beirut, Lebanon.

“**Acosta Plaintiffs**” refer to the plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Acosta, et al. v. Islamic Republic of Iran, et al.*, Civil Action No. 06-745 (RCL), who seek to enforce their judgment in the amount of \$350,172,000.00, arising from the deaths that resulted from the Iran-sponsored assassination of Rabbi Meier Kahane and the shooting of Irving Franklin and U.S. Postal Police Officer Carlos Acosta on November 5, 1990, in New York.

“Greenbaum Plaintiffs” refer to the plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Greenbaum et al. v. Islamic Republic of Iran, et al.*, Civil Action No. 02-2148 (RCL), who seek to enforce their judgment in the amount of \$19,879,023.00, arising from the death that resulted from the Iran-sponsored August 9, 2001 suicide bombing of a restaurant in downtown Jerusalem, Israel.

“Heiser Plaintiffs” refer to the plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Estate of Heiser v. Islamic Republic of Iran, et al.*, Civil Action Nos. 00-02329 and 01-02104 (RCL), who seek to enforce their judgment in the amount of \$254,431,903.00, arising from the death of 17 United States Air Force officers killed in the Iran-sponsored June 25, 1996 terrorist bombing of the Khobar Towers in Saudi Arabia.

“Levin Plaintiffs” refer to the plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Levin v. Islamic Republic of Iran, et al.*, Civil Action No. 05-02494 (GK), who seek to enforce their judgment in the amount of \$28,807,719.00, arising from the kidnapping of Jeremy Levin in Beirut on March 7, 1984.

“Murphy Plaintiffs” refer to plaintiffs identified in the complaint filed in the United States District Court for the District of Columbia entitled *Murphy v. Islamic Republic of Iran*, Civil Action No. 06-CV-596 (RCL), who seek to enforce their judgment in the amount of \$93,168,141.60, arising from the deaths of 241 United States Marines, United States Navy medical personnel and soldiers assigned to the 24th Marine Amphibious Unit that resulted from the October 23, 1983 Iran-sponsored terrorist bombing of the United State Marine Barracks in Beirut, Lebanon.